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7 *Attorneys for Defendants*
Isidro Baca, James Greg Cox, E.K. McDaniel,
8 *Brian Sandoval, Ronald Schreckengost, and Lisa Walsh*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 EDWARD SEELY,
12 Plaintiff,

13 vs.

14 ISIDRO BACA, RON SCHRECKENGOST,
LISA WALSH, E.K. MCDANIEL, GREG
15 COX, BRIAN SANDOVAL, ROSS MILLER,
CATHERINE CORTEZ-MASTO,

16 Defendants.

17 WILLIAM LYONS,

18 Plaintiff,

19 vs.

20 ISIDRO BACA, JAMES "GREG" COX, E. K.
MCDANIEL, BRIAN SANDOVAL, RONALD
21 SCHRECKENGOST, and LISA WALSH

22 Defendants.

Case No. 3:15-cv-00118-MMD-VPC
(Consolidated With Case No.
3:15-cv-00126-MMD-WGC)

**MOTION FOR EXTENSION OF TIME TO
FILE JOINT PRETRIAL ORDER**

(Second Request)

23 Defendants, Isidro Baca, James "Greg" Cox, E.K. McDaniel, Brian Sandoval, Ronald
24 Schreckengost, and Lisa Walsh (Defendants), by and through counsel, Adam Paul Laxalt, Attorney
25 General of the State of Nevada, and Ian Carr, Deputy Attorney General, hereby submit a Motion for
26 Extension of Time to File a Joint Pretrial Order. This Motion is based on Federal Rule of Civil
27 Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and
28 pleadings on file in this action.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. ARGUMENT**

3 Defendants respectfully request a thirty (30) day extension of time out from the current deadline
4 (August 27, 2018) to file a joint pretrial order in this case. Counsel for Defendants is confronted with
5 numerous competing deadlines and a high workload due to staffing changes in the Office of the
6 Attorney General. Defense counsel is new to this case, and has contemporaneously submitted a notice
7 of change of attorney. Furthermore, defense counsel has been in contact with Plaintiffs' counsel, who
8 also is confronted with numerous competing deadlines. However, such obstacles are currently being
9 resolved and the requested extension of time should afford Defendants adequate time to discuss a draft
10 joint pretrial order with Plaintiffs' counsel.

11 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

12 When an act may or must be done within a specified time, the court may,
13 for good cause, extend the time: (A) with or without motion or notice if
14 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

15 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiffs' case, but will
16 allow for a thorough order prior to trial. The requested thirty (30) day extension of time should permit
17 the parties time to collaborate upon and agree to a joint pretrial order. Upon information and belief,
18 Plaintiffs' counsel does not oppose this extension request.

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1 For these reasons, Defendants respectfully request a thirty (30) day extension of time from the
2 current deadline to file a joint pretrial order in this case, with a new deadline to and including
3 Wednesday, September 26, 2018.

4 DATED this 27th day of August, 2018.

5 ADAM PAUL LAXALT
6 Attorney General

7 By: 
8 IAN CARR
9 Deputy Attorney General
Bureau of Litigation
Public Safety Division
Attorneys for Defendants

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11 **IT IS SO ORDERED.**

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13 **U.S. DISTRICT JUDGE**

14 **DATED:** August 28, 2018
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1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that
3 on this 27th day of August 2018, I caused a copy of the foregoing, **MOTION FOR EXTENSION OF**
4 **TIME TO FILE JOINT PRETRIAL ORDER (Second Request)**, to be served, by U.S. District
5 Court CM/ECF Electronic Filing and to be deposited for mailing a true and correct copy of the
6 foregoing on the following:

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8 c/o Samaritan House
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11 William Lyons, #79249
12 Care of NNCC Law Librarian
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An employee of the
Office of the Attorney General